

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**



**K.B., Minor Child, c/o Lenda Burns, Legal  
Guardian; J.H., Minor Child, c/o Lenda  
Burns, Legal Guardian; & ESTATE OF  
CRYSTALLINE BARNES, c/o Lenda  
Barnes, Personal Representative**

**PLAINTIFFS**

v.

**CAUSE NO. 3:18-CV-644-CWR-LGI**

**OFFICER RAKASHA ADAMS, in her  
official capacity as a police officer for the  
Jackson Police Department, and in her  
personal capacity; OFFICER ALBERT  
TAYLOR, in his official capacity as a police  
officer for the Jackson Police Department,  
and in his personal capacity; & CITY OF  
JACKSON**

**DEFENDANTS**

**JURY VERDICT**

The jury is directed to answer the following questions in accordance with the Court's instructions. The answer to each question must be your unanimous decision.

1. Do you find, by a preponderance of the evidence, that the plaintiffs have proven their excessive force claim against Officer Rakasha Adams?

Yes ✓ No \_\_\_\_\_

2. If so, do you find that Officer Adams is entitled to qualified immunity?

Yes ✓ No \_\_\_\_\_

3. Do you find, by a preponderance of the evidence, that the plaintiffs have proven their excessive force claim against Officer Albert Taylor?

Yes ✓ No \_\_\_\_\_

4. If so, do you find that Officer Taylor is entitled to qualified immunity?

Yes ✓ No \_\_\_\_\_

5. Do you find, by a preponderance of the evidence, that the plaintiffs have proven their municipal liability claim against the City of Jackson?

Yes \_\_\_\_\_ No ✓

**Answer questions 6 only if you have found any defendant liable and not entitled to qualified immunity.**

6. Please itemize the damages that will compensate the plaintiffs for their injuries, if any you find:

- a. The amount of economic damages Crystalline Barnes and her estate suffered:

\$ \_\_\_\_\_

- b. The amount of non-economic damages Crystalline Barnes and her estate suffered:

\$ \_\_\_\_\_

- c. J.H.'s loss of love, affection, society, and companionship as a result of Crystalline Barnes' death:

\$ \_\_\_\_\_

- d. K.B.'s loss of love, affection, society, and companionship as a result of Crystalline Barnes' death:

\$ \_\_\_\_\_

DATE: 10 / 12 / 2022 FOREPERSON: C